

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

COUNSEL HOLDINGS, INC.

Plaintiff,

v.

**EVAN P. JOWERS, JOWERS
VARGAS LLC, JOWERS LANGER
LLC, AND LEGIS VENTURES (HK)
COMPANY LIMITED**

Defendants

Civil Action No 1:23-CV-711

**PLAINTIFF'S APPLICATION FOR CLERK'S ENTRY OF DEFAULT
AGAINST DEFENDANT JOWERS VARGAS LLC**

Pursuant to Federal Rule of Civil Procedure 55(a), Counsel Holdings, Inc. (“**Counsel**”) respectfully requests that the Clerk enter default against Defendant Jowers Vargas LLC and in support states:

1. Defendant Jowers Vargas LLC (“**Jowers Vargas**”) was properly served with a copy of Plaintiff’s complaint and summons on November 30, 2023. (Dkt. 19). Service was proper under the Court’s Order dated November 21, 2023, regarding substituted service.
2. Jowers Vargas was required to file responsive pleadings within 21 days of being served, which was on December 21, 2023. To date, Jowers Vargas has not filed an answer or other responsive pleading, nor has it requested additional time to do so. (*See Exhibit 1*, REK Decl., at ¶4).

Accordingly, the Clerk should enter default against Jowers Vargas.

Dated: February 3, 2024

Respectfully Submitted,

/s/ Robert E. Kinney

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